

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**ORDER DIRECTING PRODUCTION OF DOCUMENTS
PURSUANT TO RULE 2004 OF THE RULES OF BANKRUPTCY PROCEDURE**

Upon the application dated April 29, 2020 (the “Application”) of Eric Hestrup, *et al.* (collectively, “Private Insurance Plaintiffs”), in their individual and representative capacities (and with the class members, collectively, the “Private Insurance Class Claimants”) in their respective actions (the “Private Insurance Class Actions”), for an order, pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure (“Rule 2004”), directing the production of documents by the Family Member and/or Family Entity (as those terms are defined in the Protective Order entered on January 28, 2020 [Docket No. 784]); and for cause shown, it is hereby

ORDERED that the Application is granted in its entirety; and it is further

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

ORDERED that the Private Insurance Plaintiffs are authorized to demand the Family Member and/or Family Entity produce documents (including electronically stored information) annexed hereto as Exhibit A; and it is further

ORDERED that the Private Insurance Plaintiffs are authorized to conduct examinations of the Family Member and/or Family Entity; and it is further

ORDERED that pursuant to Rule 2004 of the Rules of Bankruptcy Procedure, the Family Member and/or Family Entity is directed to produce and deliver to Stevens & Lee, P.C., 485 Madison Avenue, New York, New York 10022, Attn: Nicholas F. Kajon, Esq., no later than ten business days after entry of this Order, the documents responsive to the Request for Production of Documents annexed hereto as Exhibit A.

Dated: White Plains, New York
May __, 2020

United States Bankruptcy Judge

Exhibit A - Document Requests by Private Insurance Plaintiffs

1. All documents concerning any transfers to or for the benefit of any insiders, including any Family Member¹ or Family Entity, including without limitation dividends.
2. All documents concerning any related party transactions including without limitation transactions between the Debtors and any of the independent associated companies (each an “IAC” or collectively the “IACs”) ultimately owned by any Family Member or Family Entity.
3. All valuations, appraisals, and investment banker presentations concerning any IAC.
4. All tax returns concerning the IACs from 1996 to the present.
5. All documents concerning the current financial condition of the IACs.
6. All insurance policies.
7. All documents concerning the value of Mundipharma, and the timing, terms, and conditions of any sale thereof.
8. All documents concerning the \$3 billion proposed to be contributed by the Family Members or Family Entities including without limitation timing, sources, terms, conditions, collateral and/or other assurances of performance and payment.
9. All documents concerning the assets, liabilities, income, expenses and financial affairs of the Family Members and Family Entities, including any transfers of assets to related parties and/or foreign jurisdictions.
10. All documents provided to the New York State Attorney General by any Family Member or Family Entity.

¹ Capitalized terms have the meanings ascribed thereto in the Protective Order entered on January 28, 2020 (Docket No. 784).